

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KENDALL RAYE ROGERS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-721-KAJ
	)	
STATE OF DELAWARE,	)	
DEPARTMENT OF PUBLIC SAFETY,	)	
DMV,	)	
	)	
Defendants,	)	

**DEFENDANT'S FIRST SET OF INTERROGATORIES DIRECTED TO PLAINTIFF**

Defendant State of Delaware, pursuant to Fed. R. Civ. Pro. 33, requests that Plaintiff answer the following interrogatories, under oath, within thirty days:

1. Identify each person who has knowledge of the facts relating to the litigation. For each, also provide an address and phone number, and state with particularity the facts for which each has knowledge and how they came to have such information.

ANSWER:

2. Identify any statement by any past or current employee of the Defendant, written or verbal, referring or relating to or regarding Kendall Rogers, and relating to the allegations made in the complaint. For each statement: state the substance of the statement, the name of the person who made the statement, to whom the statement was made, the date and time of the statement, who else was present, whether the statement was recorded in any way, and if so, how, and the person(s) who has the copies of the statement.

ANSWER:

3. State the factual and legal basis for each and every allegation of the complaint. Identify the name(s) of each person who has knowledge of the fact(s) and each document recording, referring, or relating to each fact.

ANSWER:

4. For each expert whom you expect to testify as a witness at the trial: State the name and address of each such expert and state:

- a. The subject matter on which the expert is expected to testify;
- b. The substance of the facts and opinions to which the expert is expected to testify;
- c. A summary of the grounds for each opinion of the expert;
- d. The specialty of the expert;
- e. The date of any report prepared by the expert relating to the opinion;
- f. All facts or documents provided to the expert;
- g. All cases in which the expert has testified in the past ten years;

ANSWER:

5. Identify any complaint, formal or informal, made by you alleging harassment, discrimination or a hostile work environment, and for each, state the nature and substance of the complaint, whether the complaint was verbal or written, the date of the complaint, to whom the complaint was made, and the response received to the complaint, including the person(s) who investigated the complaint, the details of the investigation, and the results.

ANSWER:

STATE OF DELAWARE  
DEPARTMENT OF TRANSPORTATION

/s/ Frederick H. Schranck

Frederick H. Schranck (ID No. 925)

Deputy Attorney General

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Delaware Department of Transportation/DMV

Dated: July 13, 2006